

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION

FILED BY *gj* D.C.
05 DEC 19 PM 4:57

NAUTILUS INSURANCE COMPANY,

Plaintiff,

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TENNESSEE

v.

NO. 2:05CV2514 Ma/V

MARK A. LOVE, individually and
d/b/a STATEWIDE SECURITY
SERVICES, RIVER WAFFLES, LLC,
MARCUS ROBINSON, STEVE MARTIN
and CARROLL ANTONIO MOBLEY, JR.,

Defendants.

JOINT ~~PROPOSED~~ RULE 16(b) SCHEDULING ORDER

Pursuant to the scheduling conference set by written notice, the following dates
were established as the final dates for:

INITIAL DISCLOSURES: **January 6, 2006**

JOINING PARTIES: For Plaintiff: **February 17, 2006**

For Defendants: **February 17, 2006**

AMENDING PLEADINGS: For Plaintiff: **February 17, 2006**

For Defendants: **February 17, 2006**

INITIAL MOTIONS TO DISMISS: **March 17, 2006**

COMPLETING ALL DISCOVERY: **August 18, 2006**

(a) EXPERT DISCLOSURE (Rule 26):

- (i.) Plaintiff's Rule 26 Expert: **June 19, 2006**
Identification & Information under Rule 26
- (ii.) Defendants' Rule 26 Expert: **July 18, 2006**
Identification & Information under Rule 26

(iii.) Expert witness depositions: **August 18, 2006**

(b) DOCUMENT PRODUCTION, INTERROGATORIES and
REQUESTS FOR ADMISSIONS: **Must be served so response is due
no later than August 18, 2006**

(c) DEPOSITIONS: **August 18, 2006**

(d) MOTIONS TO COMPEL DISCOVERY: to be filed and served within
forty-five days of the default or the service of the response, answer or
objection, which is the subject of the motion, unless the time for filing
of such motion is extended by the Court for good cause shown.

FILING DISPOSITIVE MOTIONS: **September 18, 2006**

Response due **30 days after service** of motion.

Reply due **10 days after service** of response.

OTHER RELEVANT MATTERS:

No depositions may be scheduled to occur after the discovery cutoff date. All
motions, requests for admissions, or other filings that require a response must be filed
sufficiently in advance of the discovery cutoff date to enable opposing counsel to respond
by the time permitted by the Rules prior to that date.

~~Motions to compel discovery are to be filed and served by the discovery deadline
or within 30 days of the default or the service of the response, answer, or objection,
which is the subject of the motion, if the default occurs within 30 days of the discovery
deadline, unless the time for filing of such motion is extended for good cause shown, or
the objection to the default, response, answer, or objection shall be waived.~~

This case is set for non-jury trial, and the trial is expected to last **two (2)** days.

The pretrial order date, pretrial conference date, and trial date will be set by the presiding judge.

This case is appropriate for ADR. The parties are directed to engage in court-annexed attorney mediation or private mediation after the close of discovery.

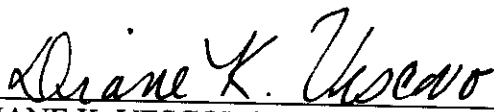
The parties are reminded that pursuant to Local Rule 11(a)(1)(A), all motions, except motions pursuant to Fed. R. Civ. P. 12, 56, 59 and 60 shall be accompanied by a proposed order.

The opposing party may file a response to any motion filed in this matter. Neither party may file an additional reply, however, without leave of the Court. *except as to a dispositive motion* If a party believes that a reply is necessary, it shall file a motion for leave to file a reply accompanied by a memorandum setting forth the reasons for which a reply is required.

The parties have not consented to trial before the magistrate judge.

This order has been entered after consultation with trial counsel pursuant to notice. Absent good cause shown, the scheduling dates set by this order will not be modified or extended.

IT IS SO ORDERED.


DIANE K. VESCOVO
UNITED STATES MAGISTRATE JUDGE

Date: December 19, 2005



Notice of Distribution

This notice confirms a copy of the document docketed as number 21 in case 2:05-CV-02514 was distributed by fax, mail, or direct printing on December 21, 2005 to the parties listed.

Mark A. Love
4255 Paula Dr.
Memphis, TN 38116

David A. McLaughlin
COCHRAN CHERRY GIVENS SMITH & BOLTON
One Commerce Square
Ste. 2600
Memphis, TN 38103

Joe E. Manuel
LAW OFFICE OF JOE MANUEL
147 N. Market St.
Ste. C
Chattanooga, TN 37405

Michael L. Mansfield
RAINEY KIZER REVIERE & BELL
105 S. Highland Ave.
P.O. Box 1147
Jackson, TN 38302--114

Honorable Samuel Mays
US DISTRICT COURT